IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

WRS, INC., d/b/a WRS MOTION PICTURE LABORATORIES, a corporation,
Plaintiff,
v.

Civil Action No. 00-2041

PLAZA ENTERTAINMENT, INC., a corporation, ERIC PARKINSON CHARLES VON BERNUTH and JOHN HERKLOTZ,
Defendants.

MOTION TO MODIFY THE DEADLINES
IN THE ORDER OF AUGUST 26, 2008 (DOCKET #221)

AND NOW comes WRS, Inc. by and through its counsel, Thomas E. Reilly, P.C. and Thomas E. Reilly, and hereby requests as follows:

1. Pursuant to the Court's previous suggestion that efforts should be made by the parties to resolve the above case, Plaintiff and Defendants, Parkinson, Von Bernuth and Plaza, have engaged in negotiations to that end.

2. At the status conference of August 26, 2008, Plaintiff and Defendants, Parkinson, Von Bernuth and Plaza, anticipated that they would have the Stipulation signed and filed on or before September 3, 2008.

3. Unfortunately, Defendants, Parkinson, Von Bernuth and Plaza, have not reached a consensus as to the terms to be included in the Stipulation as discussed at the Status Conference, however, discussions continue as to the possible conclusion of the participation of Defendants, Parkinson, Von Bernuth and Plaza in the within case.

4. By reason of the foregoing, the Stipulation contemplated by the Order of August 26, 2008, at Docket No. 221 cannot be filed on or before September 3, 2008.

WHEREFORE, Plaintiff, with the consent of Defendants, Parkinson, Von Bernuth and Plaza, respectfully ask the Court to modify the deadlines set forth in its Order of August 26, 2008 to allow the parties additional time to, if possible, reach a consensus and file the contemplated stipulation.

Respectfully submitted,

THOMAS E. REILLY, P.C.

BY: /s/ Thomas E. Reilly

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